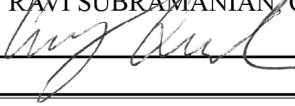


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

November 17, 2021

RAVI SUBRAMANIAN, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

v.

JOSHUA ADAM SHUEMAKE,  
Defendant.

NO. CR21-194 RAJ

INDICTMENT

The Grand Jury charges that:

**COUNT 1**

**(Unlawful Possession of a Firearm)**

On or about June 18, 2021, in King County, within the Western District of Washington, JOSHUA ADAM SHUEMAKE, knowing he was subject to a court order issued on May 4, 2021, in King County Superior Court, under cause number 21-1-03206-3 KNT, which meets the requirements of Title 18, United States Code, Section 922(g)(8)(A)-(C), did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: a Heckler and Koch (HK) VP9 9mm caliber pistol, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(8).

**COUNT 2****(False Statement)**

On or about June 18, 2021, in King County, within the Western District of Washington, JOSHUA ADAM SHUEMAKE did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, an FBI investigation into SHUEMAKE's unlawful possession of firearms; specifically, SHUEMAKE, for the purpose of concealing his possession of the firearm identified in Count 1, above, falsely told Bureau of Prisons Special Investigative Agent J.V., who was assisting the FBI's investigation, that he was living with a coworker, J.S., in Lacey, Washington, intending for J.V. to repeat that same false information to investigating FBI agents; when in truth and in fact, as SHUEMAKE then and there well knew, he was not living with J.S. at that time.

All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT 3****(Obstruction of Justice – Witness Tampering)**

Between on or about June 18, 2021, and on or about October 13, 2021, in King County and elsewhere within the Western District of Washington, JOSHUA ADAM SHUEMAKE did knowingly attempt to corruptly persuade, and did corruptly persuade, another person, namely, L.U., to provide false information and withhold true information regarding SHUEMAKE's possession of the firearm identified in Count 1, above, with intent to:

influence L.U.'s testimony in an official proceeding, that is, a federal grand jury investigation in the Western District of Washington; and

hinder and prevent the communication to law enforcement officers, that is, the FBI, relating to the commission and possible commission of a federal offense, that is, the offense charged in Count 1, above.

1 All in violation of Title 18, United States Code, Sections 1512(b)(1) and (b)(3)  
2 and 2.

3 **ASSET FORFEITURE ALLEGATION**

4 The allegations contained in Counts 1 – 3 of this Indictment are hereby realleged  
5 and incorporated by reference for the purpose of alleging forfeiture.

6 Upon conviction of Count 1, the defendant, JOSHUA ADAM SHUEMAKE, shall  
7 forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1),  
8 by way of Title 28, United States Code, Section 2461(c), any firearms or ammunition  
9 involved in or used in the offense.

10 Upon conviction of Count 3, the defendant, JOSHUA ADAM SHUEMAKE, shall  
11 forfeit to the United States, pursuant to Title 18, United States Code, Section  
12 981(a)(1)(C), by way of Title 28, United States Code, Section 2461(c), any property, real  
13 or personal, which constitutes or is derived from proceeds traceable to this offense.

14 **Substitute Assets**

15 If any of the above-described forfeitable property, as a result of any act or  
16 omission of the Defendant,

- 17 a. cannot be located upon the exercise of due diligence;  
18 b. has been transferred or sold to, or deposited with a third party;  
19 c. has been placed beyond the jurisdiction of the Court;  
20 d. has been substantially diminished in value; or  
21 e. has been commingled with other property which cannot be divided  
22 without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
2 853(p) and 28 U.S.C. § 2461(c), to seek the forfeiture of any other property of the  
3 Defendant up to the value of the above-described forfeitable property.  
4

5 A TRUE BILL:

6 DATED: 17 November 2021

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8 *Signature of foreperson redacted*  
9 *pursuant to the policy of the Judicial*  
10 *Conference of the United States*

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FOREPERSON

  
NICHOLAS W. BROWN  
United States Attorney

  
TODD GREENBERG  
Assistant United States Attorney

  
JESSICA MANCA  
Assistant United States Attorney